REMARKS

In the Office Action, claims 1-11, 20, 22-25, 31-35 and 37-54 were rejected. By the present Response, Applicants have amended claims 1, 20, 31, 34, 42, 47, and 50. These amendments do not add any new matter. Upon entry of these amendments, claims 1-11, 20, 22-25, 31-35, and 37-54 remain pending in the present application and are believed to be in condition for allowance. In view of the foregoing amendments and the following remarks, Applicants respectfully request reconsideration and allowance of all pending claims.

Claim Rejections Under 35 U.S.C. § 102

Claims 1-11, 20, 22-25, 31-35 and 37-54 were rejected under 35 U.S.C. §102(e) as anticipated by Skoolicas (U.S. Patent No. 6,230,403). Applicants respectfully traverse this rejection. The Skoolicas reference has been carefully evaluated, including the passages cited by the Examiner and the remainder of the reference. The reference does not disclose all of the steps or components of the pending claims. Reconsideration and allowance of all of the pending claims are requested based upon the remarks set forth below.

Legal Precedent

Anticipation under Section 102 can be found only if a single reference shows exactly what is claimed. *See Titanium Metals Corp. v. Banner*, 227 U.S.P.Q. 773 (Fed. Cir.1985). For a prior art reference to anticipate under Section 102, every element of the claimed invention must be identically shown in a single reference. *See In re Bond*, 15 U.S.P.Q.2d 1566 (Fed. Cir.1990). Accordingly, the Applicants need only point to a single element not found in the cited reference to demonstrate that the cited reference fails to anticipate the claimed subject matter.

The Skoolicas reference fails to disclose configuration or programming of components from a database after assembly of the components in a system

As stated above, the prior art reference must disclose every element of Applicants' invention in order to anticipate under Section 102. With regard to the instant rejections, Applicants respectfully assert that at least one aspect of the invention recited in the independent claims is not disclosed by the Skoolicas reference. For example, independent claims 1, 20, 31, 34, 42, 47, and 50 recite, in pertinent part:

> Claim 1: "configuring memory objects within the devices by downloading, after assembly, at least the device designation data from the database into respective memory objects of the devices." (emphasis added.)

> Claim 20: "programming the programmable components by downloading information from the database, after assembly, into respective memory objects of the programmable components." (emphasis added.)

> Claim 31: "a component programming module adapted to access data from the database and to download the data, after assembly, into respective memory objects of each programmable component." (emphasis added.)

> Claim 34: "configuring memory objects within the devices by downloading at least the device designation data from the database, after assembly, into the memory objects." (emphasis added.)

> Claim 42: "programming the programmable components by downloading at least device designation data from the database, after assembly, into respective memory objects of each programmable component." (emphasis added.)

> Claim 47: "a component programming module adapted to access data from the database and to download the data, after assembly, into respective memory objects of each programmable component." (emphasis added.)

> Claim 50: "programming the programmable
> components by downloading at least the device designation
> data from the database, <u>after assembly</u>, into respective
> memory objects of each programmable component."
> (emphasis added.)

Generally, each of the above cited claims recites programming a component *after assembly* of the parts has taken place. Applicants respectfully assert that the Skoolicas reference does not disclose such post-assembly programming from a database.

The Skoolicas reference discloses the following at column 34, lines 41-57:

> An example of a computer integrated manufacturing "CIM"
> system assembly area is shown in FIG. 24. A computer
> screen 701A displays customer order information provided
> by the CIM system at a part kitting station 701 enabling the
> operator to collect the necessary components to build the
> system. The SMI provides this information for each order
> to CRT701A. At microprocessor programming station 702,
> the programmable devices for the front-end board are
> programmed using programming specifications 702A
> provided by the SMI. The modules, mounting plate, and
> heatsinks are assembled together at station 703. Bill-of-
> material and assembly drawing information 703A generated
> by the SMI are displayed on a CRT near station 703 by the
> CIM system for reference by the operator. The
> programmed device is assembled to the front end at station
> 704 with reference to the assembly drawing displayed at
> CRT 704A.

Skoolicas clearly discloses a method whereby the *already programmed* devices are then assembled. That is, Skoolicas discloses a method where assembly of the components follows the programming of certain components. Specifically, Skoolicas states, "the programmed device is assembled..." *See* Skoolicas, column 34, lines 54-55. On the contrary, Applicants claim a technique whereby the information from the database

is downloaded and programmed into the memory objects embedded within each component *after assembly* of the components has already taken place.

FIG. 14 of the present invention shows the assembly of the components of the system, as indicated at step 230. This assembly is followed by the component configuration from the database, shown at step 232, such as by downloading the database entries into the memory objects embedded within each component. Accordingly, Applicants disclose assembly followed by programming, whereas Skoolicas discloses programming followed by assembly. Therefore, Applicants respectfully submit that Skoolicas cannot support a *prima facie* case for anticipation under Section 102 with respect to independent claims 1, 20, 31, 34, 42, 47 and 50. Accordingly, Applicants respectfully request withdrawal of the Examiner's rejection and allowance of claims 1, 20, 31, 34, 42, 47, and 50, as well as all claims dependent therefrom.

Conclusion

In view of the remarks and amendments set forth above, Applicants respectfully request allowance of the pending claims. If the Examiner believes that a telephonic interview will help speed this application toward issuance, the Examiner is invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,

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